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VIA EMAIL

United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

June 9, 2021

**U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
LONG ISLAND OFFICE**

Honorable A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court

Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Ajay Bahl v. New York College of Osteopathic Medicine of New
York Institute of Technology, et al., 14-CV-04020 (AKT)*

Dear Judge Tomlinson:

Plaintiff Ajay Bahl in the above above-referenced action writes to respectfully respond to the courts May 26, 2021, order which in part indicated the court is providing plaintiff an opportunity and granting permission to file a two-page letter advising the court "how he intends to proceed in this action with respect to the previously proposed schedule for summary judgment motion practice."

Plaintiff previously stated, "Plaintiff anticipates moving for summary judgment but cannot say definitively due to outstanding fact discovery." At present, Plaintiff withholds from any position on summary judgment prior to resolution of disputes relating to the recently released privilege log.

With respect to the previously proposed schedule for defendant's summary judgment motion practice, plaintiff previously stated "Plaintiff requests that summary judgment motion practice not commence until at least 3 weeks after fact discovery disputes are resolved." Additionally, at present, plaintiff anticipates needing more time to review the case matter and fact discovery.

Respectfully Submitted,

Plaintiff

/s/
Ajay Bahl

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